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FILED

APR 14 2025

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

Heidi D. Campbell, Clerk
U.S. DISTRICT COURT

(1) "SARAH", (2) "HENLEY",
(3) "JANE DOE" as conservator for "SAVANNAH"
a protected person, and for "SKYLAR" a minor,
(4) "JOHN DOE" as conservator for "SALLY",
(5) "MAUREEN", (6) "PIA", and (7) "MYA",

Plaintiffs,

v.

(1) JEFFREY RAHN REETZ,

Defendant.

Case No. 4:23-cv-00474-JDR-SH

DEFENDANTS ANSWER TO THE COURT ORDER
DENIAL OF DEFENDANTS MOTION TO DISMISS

I JEFFREY RAHN REETZ COME BEFORE YOU PRO SE TO STATE THAT I HAVE NEVER VIEWED OR DOWNLOADED ANY CHILD PORNOGRAPHY. I HAVE NEVER SEEN OR VIEWED ANY IMAGES OF ANY OF THE PLAINTIFFS AS MINORS OR ADULTS. IN THE ORDER OF DENIAL IT IS STATED "MR. REETZ DENIES THAT HE EVER POSSESSED CHILD PORNOGRAPHY AND ARGUES THAT THE PLAINTIFFS CLAIM SHOULD BE DISMISSED ON THAT BASIS". THAT STATEMENT IS FACTUALLY UNTRUE. I DID IN FACT ADMIT TO POSSESSION OF CHILD PORNOGRAPHY AND TOOK A PLEA TO SUCH. I STIPULATE THAT CHILD PORNOGRAPHY WAS IN FACT FOUND ON THE HARD DRIVE OF A COMPUTER WHICH I OWNED. THIS FACT WAS FURTHER CONFIRMED BY MY OWN FORENSIC EXPERTS. FOR THESE REASONS I DID IN FACT TAKE A PLEA DEAL FOR POSSESSION OF CHILD PORNOGRAPHY. THE PLEA WAS TAKEN AT THE URGING OF MY LEGAL COUNSEL AND FAMILY. THE EXTENUATING CIRCUMSTANCES SURROUNDING THIS DECISION TO TAKE THE PLEA DEAL WERE AS FOLLOWS: THE DEAL WAS FOR 42 MONTHS OF IMPRISONMENT. I HAD ALREADY SERVED 2 YEARS IN OKMULGEE COUNTY JAIL (WHICH CAN ONLY BE DESCRIBED AS "HELL ON EARTH"). I HAD SPENT VIRTUALLY ALL OF MY MONEY ON LEGAL DEFENSE AND LOST MY COMPANY.

I WAS TOLD BY MY ATTORNEYS THAT GETTING TO TRIAL WOULD TAKE AT LEAST ANOTHER YEAR AND COST AT LEAST ANOTHER \$100,000. MY ATTORNEY ALSO ADVISED THAT IF I TOOK THE PLEA DEAL I WOULD SERVE THAT REMAINING TIME IN A FEDERAL FACILITY, THUS GET OUT OF OKMULGEE COUNTY JAIL. FOR THESE REASONS AND THE FACT THAT CHILD PORNOGRAPHY WAS FOUND ON THE COMPUTER WHICH I OWNED I FELT AVAILED TO CONCEED WITH THE ADMISSION OF POSSESSION WITHOUT THE FEAR OF PERJURY. TO BE CLEAR, I JEFFREY RAHN REETZ AM NOT ARGUING THAT A COMPUTER WHICH I OWNED DID NOT HAVE CHILD PORNOGRAPHY ON THE HARD DRIVE, I IN FACT AM STIPULATING THAT IT WAS INDEED PRESENT. AS TO THE APPLICATION OF THE ESTOPPEL THEORY OF LAW IN THIS CASE. I AM NOT DISPUTING THE UNDERLYING FACT THAT I POSSESSED CHILD PORNOGRAPHY. HOWEVER I AM ARGUING THAT I HAVE NOT VIEWED OR DOWNLOADED ANY IMAGES OF ANY OF THE PLAINTIFFS. I IN FACT FIND CHILD PORNOGRAPHY ABERRANT, DISGUSTING AND ABHOR THE THOUGHT OF SUCH THINGS. I AM ARGUING THAT THE IMAGES WERE IN FACT DOWNLOADED BY MY DECEASED EXWIFE DANIELLE. DANIELLE DID THIS WITH MALICIOUS INTENT, SHE HAD COMPLETE ACCESS TO MY COMPUTERS AND CREDIT CARDS. DANIELLE HAD A VERY SERIOUS ADDICTION TO METHAMPHETAMINES AND WAS UNDER A DOCTORS TREATMENT FOR A BIPOLAR DISORDER. THE LAST YEAR OF OUR MARRIAGE SHE TRULY WENT OFF THE DEEP END. SHE WAS ARRESTED FOR ASSAULT TWICE. ADDITIONALLY SHE WAS ARRESTED FOR THREATS TO KILL ME AND SUBSTANTIAL PROPERTY DAMAGE TO MY HOME AND CAR. SHE REPEATEDLY TOLD PEOPLE THAT SHE WAS GOING TO PUT ME IN PRISON OR KILL ME. I IN FACT HAD TO FILE A PROTECTIVE ORDER AGAINST DANIELLE. THIS IS TRULY A SAD STORY AS IT IN FACT ENDS WITH A VERY TROUBLED PERSON (MY EXWIFE DANIELLE) ENDING HER LIFE THROUGH SUICIDE.

I INTEND TO ARGUE THAT ALTHOUGH I UNWITTINGLY POSSESSED CHILD PORNOGRAPHY I NEVER SAW OR PURCHASED ANY IMAGES OF THE PLAINTIFFS. ERGO, I NEVER KNEW, SAW, INTERACTED WITH, OR VIEWED ANY IMAGES OF THE PLAINTIFFS, SO HOW HAVE I CAUSED THEM ANY SUFFERING OR PERSONAL HARM OR INJURY. WITH THE PREPONDERANCE OF THE EVIDENCE I WILL DEMONSTRATE TO THE JURY THAT THIS TYPE OF MALICIOUS INTENT COULD IN FACT OCCURE TO ANYONE AS IT HAS HAPPENED TO ME.

MOTION TO DISALLOW EVIDENCE OF PRIOR CRIMINAL RECORD

I JEFFREY RAHN REETZ COME BEFORE THE COURT PRO SE TO RESPECTFULLY REQUEST THAT NO EVIDENCE, DISCUSSION, FACTS OR INTIMATION OF FACTS PERTAINING TO ANY REFERENCE REGARDING THE DEFENDANTS PRIOR CRIMINAL RECORD, BE ALLOWED OR ADMISSIBLE. THIS INFORMATION PRESENTED IN ANY MANNER WOULD CERTAINLY UNDOEZY PREJUDICE AND INFLUENCE THE JURY. ALLOWING THIS EVIDENCE WOULD UNDOUBTEDLY PREJUDICE THE JURY AND MAY IN FACT SUBVERT THE JUDICIAL PROCESS IN THESE PROCEEDINGS. THE AFOREMENTIONED EVIDENCE HAS NO PROBITIVE VALUE IN THIS MATTER, AS I AM WILLING TO STIPULATE TO THE POSSESSION OF CHILD PORNOGRAPHY. THEREFORE IT CAN ONLY HAVE UNDOE PREJUDICIAL VALUE UNDER MANY LEGAL RULES. THIS EVIDENCE WOULD NOT BE ADMISSABLE FOR PURPOSES OF PROVING MOTIVE, OPPORTUNITY, INTENT, PREPERATION, PLAN, KNOWLEDGE, IDENTITY, ABSENTS OF MISTAKE, OR LACK OF ACCIDENT. ADDITIONALLY THIS EVIDENCE WOULD BE PROHIBITED FOR USE TO PROVE A PERSONS CHARATER TRAIT.

MOTION TO OBJECT TO PLAINTIFFS PROTECTIVE ORDER

I JEFFREY RAHN REETZ COME BEFORE THE COURT PRO SE TO RESPECTFULLY REQUEST THE PROTECTIVE ORDER OF 3/7/24 ORDERED BY MAGISTRATE JUDGE SUSAN E. HUNTSMAN BE DISALLOWED. THIS ORDER JUST NOW BECAME APPARENT TO ME BY THE PLAINTIFFS ATTORNEY SENDING ME A COPY OF SUCH ORDER. THIS ORDER WAS DONE ENTIRELY EX PARTE. I HAD NO INDICATION OF THE PENDING ORDER, THUS NO ABILITY TO OBJECT TO IT. THE ORDER STATES THAT THE DEFENDANTS RESPONSE WAS DUE BY 4/6/24 AND THAT THERE WAS NO OBJECTION. HOW COULD I HAVE OBJECTED TO THIS ORDER HAVING NO KNOWLEDGE OF ITS EXISTENCE. HAD I KNOWLEDGE OF THE EXISTENCE OF THIS EX PARTE ORDER, I MOST CERTAINLY WOULD HAVE OBJECTED. THIS ORDER DISALLOWS THE DEPOSITION OF THE PLAINTIFFS. IN FACT THE DEPOSITION OF THE PLAINTIFFS IN THESE PROCEEDINGS IS VERY NECESSARY TO THE DEFENCE MOUNTING A MEANINGFUL ARGUMENT. FURTHER THERE WAS NO NEED OR APPROPRIATE NECESSITY FOR THIS EX PARTE ORDER. THE PLAINTIFFS HAVE NO REASONABLE CAUSE FOR A PROTECTIVE ORDER IN THIS MATTER. I REPRESENT NO THREAT OR POSSIBLE HARM TO ANY OF THE PLAINTIFFS. I RESTATE MY OPENING BRIEF WHERE I STIPULATED TO THE USE OF PSEUDONYMS.

DEFENDANTS' OPENING BRIEF IN SUPPORT OF DEFENDANTS'
MOTION TO DISMISS

I. STATEMENT OF DEFENDANT

I JEFFREY RAHN REETZ DO STATE THAT I HAVE NEVER VIEWED OR DOWNLOADED ANY CHILD PORNOGRAPHY. I ABHOR CHILD PORNOGRAPHY AND FIND THE IDEA OF IT ABERRANT AND DISGUSTING. I AM NOT FAMILIAR WITH ANY OF THE PSEUDONYMS AND OR THE INDIVIDUALS ASSOCIATED WITH THE PLAINTIFFS ACTION. I HAVE NEVER SEEN OR VIEWED IMAGES OF ANY OF THESE INDIVIDUALS AS MINORS OR ADULTS, THEREFORE THEY HAVE NO NEED TO FEAR ANY HARASSMENT, INJURY, RIDICULE, OR PERSONAL EMBARRASSMENT FROM ME. THIS BEING SAID, I AM SYMPATHIC TO THE PLAINTIFFS REQUEST FOR REMAINING ANONYMOUS, AS LONG AS IT DOES NOT EFFECT MY ABILITY TO DISCOVER CERTAIN FACTS ALLOWING ME TO MOUNT A REASONABLE DEFENSE.

UNDERSTANDING THE SENSITIVITY OF THE PLAINTIFFS AND BEING VERY SYMPATHETIC TO THEIR HORRIBLE PAST AND EXPERIENCE, I JEFFREY RAHN REETZ AM WILLING TO STIPULATE TO THE PLAINTIFFS USE OF PSEUDONYMS.

I JEFFREY RAHN REETZ A 71 YEAR OLD MAN, AM NOT VERY COMPUTER LITERATE, AND HAVE NEVER USED PASSWORD PROTECTION. MY EXWIFE DANIELE WAS VERY COMPUTER LITERATE AND PERPETRATED THIS MOST HEINOUS CRIME UPON ME WITH MALICIOUS INTENT. I HAD NO KNOWLEDGE AT THE TIME WHAT SHE WAS DOING WITH THE COMPUTER AND COULD NOT BELIEVE THAT SHE WOULD DO SUCH A THING. I AM NOT FIRMILARY WITH THE PLAINTIFFS OR ANY OF THEIR IMAGES. I DID NOT KNOWINGLY POSSESS ANY IMAGES OF CHILD PORNOGRAPHY. I RESPECTFULLY REQUEST THE COURT ALLOW MY PRO SE REPRESENTATION AS I CAN NOT AFFORD LEGAL COUNSEL. WITH MY CONVICTION I HAVE LOST EVERYTHING AND AM UNEMPLOYABLE. ALL I HAVE LEFT IS SOCIAL SECURITY AND ALL OF THAT GOES TO FEDERAL RESITUTION PAYMENTS. MY SON SUPPORTS ME AND PAYS FOR MY LIVING EXPENSES. ALTHOUGH I FEEL VERY SYMPATHIC TO THE PLAINTIFFS AS VICTIMS OF THESE CRIMES, HOWEVER I CERTAINLY HAVE DONE NOTHING TO HARM THEM. FURTHER THESE PROCEEDING YIELD NOTHING AS I HAVE NO MEANS TO SATISFY ANY POSITIVE OUTCOME ON THE PART OF THE PLAINTIFFS. NOT BEING ABLE TO SATISFY ANY MONETARY OR FINANCIAL OUTCOME OF THESE PROCEEDINGS MY ONLY OPTION WOULD BE BANKRUPTCY. DUE TO THESE CIRCUMSTANCES IT IS INEXPLICATIVE AND COUNTERINTUITIVE AS TO WHY WE WOULD CONTINUE TO WASTE THE COURT AND TAX PAYER TIME AND RESOURCES.

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RESPECTFULLY SUBMITTED
 JEFFREY RAHN REETZ

